

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**RICHARD J. ISOLDE, Individually and on  
Behalf of All Others Similarly Situated,**

Plaintiff,

VS.

TRINITY INDUSTRIES, INC., et al.,

Defendants.

Civil Action No. 3:15-cv-02093-K  
(CONSOLIDATED)

CLASS ACTION

Judge Ed Kinkeade

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING  
THE SCHEDULE FOR THE CONSOLIDATED COMPLAINT  
AND DEFENDANTS' RESPONSE THERETO**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, as attorneys of record for Lead Plaintiffs Plumbers and Pipefitters National Pension Fund, United Association Local Union Officers & Employees' Pension Fund and the Department of the Treasury of the State of New Jersey and its Division of Investment (collectively, "Lead Plaintiffs") and Defendants Trinity Industries, Inc., Timothy R. Wallace and James E. Perry (collectively, "Defendants"), as follows:

1. Lead Plaintiffs shall file a consolidated complaint (the "Complaint") on or before May 11, 2016;
2. Defendants shall answer, move against, or otherwise respond to the Complaint on or before July 13, 2016;
3. In the event Defendants move to dismiss the Complaint, Lead Plaintiffs shall file their opposition to such motion on or before September 2, 2016;
4. In the event Defendants move to dismiss the Complaint, Defendants shall file their reply in further support of such motion on or before October 17, 2016; and
5. Lead Plaintiffs and Defendants reserve all rights and do not waive any rights through this stipulation, including their rights to move to stay or to seek additional adjournments or extensions of the above deadlines.

DATED: March 14, 2016

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*/s/ Joe Kendall*  
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DATED: March 14, 2016

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\* \* \*

**ORDER**

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE ED KINKEADE  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, March 14, 2016, I electronically filed the foregoing using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

*/s/ Joe Kendall*

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